REMARKS/ARGUMENTS

These remarks are made in response to the Office Action of November 27, 2007 (Office Action). As this action is timely filed within the three-month shortened statutory period, no fees are believed due. However, the Office is expressly authorized to charge any deficiencies or credit any overpayments to Deposit Account 50-0951.

Claims Rejections – 35 USC § 103

In the Office Action, Claims 1, 3-6, 8-10, 12-15, 17-19, 21-24, and 26-27 were rejected under 35 U.S.C.§ 103(a) as being unpatentable over U.S. Patent 5,860,064 to Henton (hereinafter Henton), in view of U.S. Patent 7,191,131 to Nagao (hereinafter Nagao) and further in view of U.S. Patent 6,081,774 to de Hita, *et al* (hereinafter de Hita).

Claims 2, 7, 11, 16, 20, and 25 were rejected under 35 U.S.C.§ 103(a) as being unpatentable over Henton in view of de Hita and Nagao, and in further view of U.S. Patent 7,103,548 to Squibbs, *et al.* (hereinafter Squibbs).

Although Applicants respectfully disagree with the rejections, Applicants nevertheless have amended each of the independent claims so as to expedite prosecution of the present application by emphasizing certain aspects of the invention. Applicants respectfully note, however, that neither the amendments nor cancellation of claims are intended as, and should not be interpreted as, the surrender of any subject matter. Accordingly, Applicants respectfully reserve the right to present the original version of any of the amended claims in any future divisional or continuation applications from the present application.

In particular, Applicants have amended independent Claims 1, 10, and 19 to further emphasize certain aspects of the invention. The claim amendments, as discussed herein, are fully supported throughout the Specification. No new matter has been introduced by virtue of any of the claim amendments.

Aspects of Applicants Invention

It may be helpful to reiterate certain aspects of Applicants' invention prior to addressing the cited references. One embodiment of the invention, as typified by amended Claim 1, is a method for automatically marking a document to be read by a text-to-speech reader with voice type identifiers.

The method can include identifying two or more voice types available to the text-to-speech reader, and identifying text elements within the document. Each voice type can have a corresponding voice type identifier. Identifying text elements, more particularly, can comprise marking gross structural subdivisions of text with a first set of sequenced tags, marking individual paragraphs of the text with a second set of sequenced tags, and marking text elements with a third set of sequenced tags to generate a hierarchical tree identifying the text elements. (See, e.g., Specification, paragraph [0021], lines 1-9.)

The method further can include grouping similar text elements together. The step of grouping similar text elements can include generating one or more clusters according to each identifiable topic of the document. (See, e.g., Specification, paragraph [0022], lines 1-3, and paragraph [0029], lines 1-7.) Additionally, the step of grouping can include syntactically parsing the document and subsequently performing text mining to determine which text elements in the document are similar. More particularly, similarity can be based upon lexical affinities among the text elements. (See, e.g., Specification, paragraph [0034], lines 1-3.). The method also can include classifying the grouped text elements according to voice types available to the text-to-speech reader. (See e.g., Specification, paragraph [0020], lines 3-4.).

Additionally, the method can include marking the classified grouped text elements within the document with corresponding voice type identifiers. (See e.g., Specification, paragraph [0020], lines 4-6.)

The Claims Define Over The Cited References

Henton describes a mapping between emotional intent and prosodic features in the acoustic signal, which must be manually added to the audio by the user. In contrast, the present invention relates to an automated method of marking a document to be read by a text-to-speech reader using entire voice types, not individual prosodic features.

Also, none of the other cited references discloses a method for automatically marking a document to be read by a text-to-speech reader with voice type identifiers.

Nagao discloses an electronic document processing apparatus for processing a tagged document. First, it is noted that, in contrast to the present invention, in Nagao the document to be processed is already tagged (see Fig. 4, Step S1). Second, as shown in Fig. 4, Step S2, of Nagao, a speech read-out file is generated based on the tagged-file by deriving the attribute information for read-out from the tag in the tagged file (see also col. 12, lines 49-55). Clearly, Nagao does not disclose marking the document to be read by a text-to-speech reader with voice type identifiers. Rather, Nagao discloses reading the tagged document to derive attribute information for read-out from the tag. Nagao does not describe how the document was tagged. As described in the background of the specification of the instant application, tags are conventionally inserted into a document manually by the document designer, which is precisely one of the problems the present invention solves.

De Hita discloses a natural language information retrieval system. De Hita, however, has nothing to do with automatically marking a document to be read by a text-to-speech reader with voice type identifiers.

Squibbs describes a message-conversion system for converting a text message into audio form. The conversion is effected in a manner enabling emotions, encoded by indicators embedded in the text message. Similarly to that of Nagao, the system of Squibbs is also used to process a already tagged document, not to automatically mark a document with tags or voice type identifiers. As described in col. 4, lines 46-50 of

Squibbs, the audio services node 15 is arranged to customize its voicing of the message in accordance with tags included in the text form of the message. As described in col. 4, lines 57-58 of Squibbs, the tags are included into the text-form of the message 11 by the sender of the message. Clearly, in Squibbs the tags are already included in the text form of the message before being processed by the message-conversion system.

Applicants, therefore, believe that none of the cited references, whether alone or in combination, teaches or suggests every feature recited in independent Claims 1, 10, and 19. Independent claims 1, 10, and 19 are, therefore, believed to be patentable over the art, and the dependent claims are believed to be patentable as well due to their dependency.

Applicants thus respectfully request that the claims rejections under 35 U.S.C. § 103 be withdrawn.

CONCLUSION

Applicants believe that this application is now in full condition for allowance. Allowance of the application, accordingly, is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Response, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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Gregory A. Nelson, Registration No. 30,577
Richard A. Hinson, Registration No. 47,652
Yonghong Chen, Registration No. 56,150
AKERMAN SENTERFITT
Customer No. 40987
Post Office Box 3188
West Palm Beach, FL 33402-3188
Telephone: (561) 653-5000